

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VICENTE SALCEDO, GERALD LINDEN,
and BRIAN MERVIN, individually and on
behalf of all others similarly situated,

No. 1:17-cv-08173-JHR-AMD

Plaintiffs,

CLASS ACTION

vs.

SUBARU OF AMERICA, INC., a New
Jersey Corporation, and
SUBARU CORPORATION, a Japanese
Corporation,

Defendants.

**DECLARATION OF MATTHEW D. SCHELKOPF IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF THE CLASS ACTION SETTLEMENT**

I, Matthew D. Schelkopf, under penalty of perjury, declare as follows:

1. I am a partner at the law firm of Sauder Schelkopf LLC in Berwyn, Pennsylvania. I respectfully submit this Declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Class Action Settlement. My declaration is based on my personal knowledge of the facts set forth herein, and, if called to so, could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the executed Settlement Agreement, and respective exhibits, entered and agreed to by Plaintiffs and Defendants on August 20, 2018.

- a. Attached to the Settlement Agreement as **Exhibit A** is a true and correct copy of the Claim Form.
- b. Attached to the Settlement Agreement as **Exhibit B** is a true and correct copy of the proposed Class Notice to be disseminated to the Settlement Class Members.
- c. Attached to the Settlement Agreement as **Exhibit C** is a true and correct copy of the proposed order granting final approval of the class action settlement, entering judgment regarding settlement, and dismissing this Action with prejudice.
- d. Attached to the Settlement Agreement as **Exhibit D** is a true and correct copy of the proposed order granting preliminary approval of the class action settlement.
- e. Attached to the Settlement Agreement as **Exhibit E** is a true and correct copy of the proposed Claim Decision and Option Selection Form, wherein Subaru will advise any Settlement Class Members of a decision for less than full reimbursement sought by a Settlement Class Member,

and which will advise the Settlement Class Members as to the options he/she has.

f. Attached to the Settlement Agreement as **Exhibit F** is a true and correct copy of the proposed Request for Exclusion Form to be disseminated to the Settlement Class Members.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: August 21, 2018

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf